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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
EUGENE DIVISION

PRESTON BERMAN,

Petitioner,

v.

DOLORES MATTEUCCI,

Respondent

Case No: 6:23-cv-00660-MO

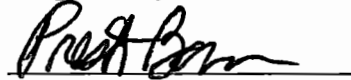
MOTION FOR APPOINTMENT OF
COUNSEL

I, Preston Jacob Berman, the petitioner in the above-captioned case, respectfully move this Court for the appointment of counsel pursuant to 18 U.S.C. § 3006A(a)(2)(B). I submit this motion based on the following grounds:

1. My case involves complex legal issues concerning the constitutional rights of individuals found guilty except for insanity. It requires significant interpretations of federal and state law and an understanding of recent legal precedents such as *Ingle v. Matteucci*.
2. I suffer from bipolar disorder, a serious mental health condition that significantly affects my cognitive functions and decision-making abilities when active. This condition has greatly impacted my ability to effectively understand and navigate the legal system in the past.

3. Given the intricate nature of the legal issues in my case and my mental health condition, skilled legal representation is crucial to ensure a fair and equitable handling of my case. An attorney would provide the necessary legal expertise and be better equipped to manage the procedural and substantive legal aspects.
4. The appointment of counsel in my case is in the interest of justice. The legal issues I present are not only important to me but potentially to others in similar situations. Effective legal representation is vital to adequately present these issues before the Court.
5. Therefore, I respectfully request that this Honorable Court appoint counsel to represent me in this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Preston Berman", written over a horizontal line.

Preston Jacob Berman

Dated: 1/16/24